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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,

Case No. 2:14-cr-00220-02-JCM-GWF

10 Plaintiff,

STIPULATION FOR PROTECTIVE ORDER

11 vs.

12 COLLETTE WINN,

13 Defendant.
14

15 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
16 United States Attorney for the District of Nevada, and Christina M. Brown, Assistant United States
17 Attorney, counsel for the United States, Monique N. Kirtley, Assistant Federal Public Defender,
18 counsel for defendant COLLETTE WINN, that this Court issue an Order protecting from disclosure
19 to the public any discovery documents containing the personal identifying information such as social
20 security numbers, driver's license numbers, dates of birth, or addresses, of participants, witnesses
21 and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents."

22 The parties state as follows:

23 1. Protected Documents which will be used by the government in its case in chief
24 include personal identifiers, including social security numbers, driver's license numbers, dates of

1 birth, and addresses, of participants, witnesses, and victims in this case.

2 2. Discovery in this case is voluminous. Many of the documents include personal
3 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent
4 the timely disclosure of discovery to defendant.

5 3. The United States agrees to provide Protected Documents without redacting the
6 personal identifiers of participants, witnesses, and victims.

7 4. Access to Protected Documents will be restricted to persons authorized by the Court,
8 namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts, and
9 secretaries employed by the attorney(s) of record and performing on behalf of defendant.

10 5. The following restrictions will be placed on defendant, defendant's attorney(s) and
11 the above-designated individuals unless and until further ordered by the Court. Defendants,
12 defendants' attorneys and the above-designated individuals shall not:

- 13 a. make copies for, or allow copies of any kind to be made by any other person
14 of Protected Documents;
- 15 b. allow any other person to read Protected Documents; and
- 16 c. use Protected Documents for any other purpose other than preparing to defend
17 against the charges in the Indictment or any further superseding indictment arising out of this case.

18 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
19 pursuant to this order of the existence and terms of this Court's order.

20 7. The requested restrictions shall not restrict the use or introduction as evidence of
21 discovery documents containing personal identifying information such as social security numbers,
22 driver's license numbers, dates of birth, and addresses during the trial of this matter.

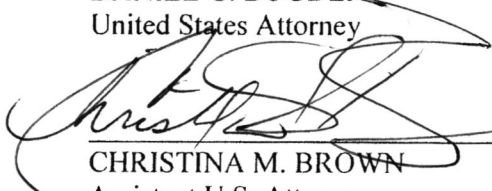
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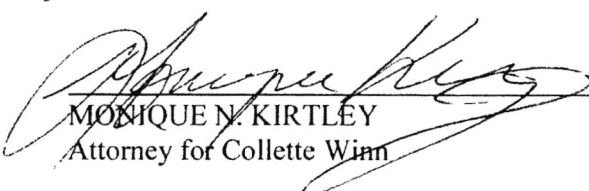
1 8. Upon conclusion of this action, defendant's attorney(s) shall return to government
2 counsel or destroy and certify to government counsel the destruction of all discovery documents
3 containing personal identifying information such as social security numbers, driver's license
4 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the
5 last appeal is final or as otherwise required by counsel's professional responsibility requirements.

6 DATED this 22 day of July, 2014.

7 DANIEL G. BOGDEN
8 United States Attorney

9 
10 CHRISTINA M. BROWN
11 Assistant U.S. Attorney

12 RENE L. VALLADARES
13 Federal Public Defender

14 
15 MONIQUE N. KIRTLEY
16 Attorney for Collette Winn

17 ORDER

18 IT IS SO ORDERED this 23rd day of July 2014.

19 
20 GEORGE FOLEY, JR.
21 United States Magistrate Judge